

Creased Puddle Ltd is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your business relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Creased Puddle Ltd is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

Data protection principles:

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you:

Personal data, or personal information, means any information about an individual from which that person can be identified. Such as your name, address, email and phone number. It does not include data where the identity has been removed (anonymous data).

How is your personal information collected?

We collect personal information about you from:

- Fields you complete on our website;
- 'Newsletter Sign-Up' form;
- Telephone or email conversations;
- Our Booking Form;

Your information may be given to us by a third party booking a service on your behalf. Where personal information is given by a third party, by submitting our booking form and entering into a contract with us, they confirm that they have obtained all appropriate consents to share your Personal Data (Clause 15.3 Creased Puddle Terms & Conditions).

We may collect additional personal information in the course of our contractual relationship with you.

The information collected about you is based on the services that you require and may include Special Category Data if relevant to the service booked.

We may also obtain information about you that is in the public domain.

How we will use information about you:

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to deliver the agreed products and services to you.
2. For internal accounting.
3. Where we need to comply with a legal obligation.
4. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.
5. To facilitate your use of our website.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest (or for official purposes).

If you fail to provide personal information:

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you

Or we may be prevented from complying with our legal obligations such as to ensure your health and safety.

Change of purpose:

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Sensitive personal information:

"Special categories" of particularly sensitive personal information require higher levels of protection.

We need to have further justification for collecting, storing and using this type of personal information.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Situations in which we will use your sensitive personal information:

We may process special categories of personal information in the following circumstances:

1. Our services may result in the disclosure of, or concerns relating to neurodivergence. A neurodivergent condition, such as autism, is given special protections under Data Protection Laws as it is data relating to an individual's health and is classified as "special category data".
2. We will use information about your physical or mental health, or disability status to ensure your health and safety for the duration of your contract with us.
3. Less commonly, we may process special category data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Information about criminal convictions:

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

Data sharing:

Why might you share my personal information with third parties?

We may share your personal information with third parties, such as third-party service providers (including contractors and designated agents):

1. Who we have engaged to provide a service to you;
2. Who we have engaged to provide a service to us (such as accounting);
3. Where required by law;
4. Where it is necessary to administer the working relationship with you;
5. Where we have another legitimate interest in doing so.

How secure is my information with third-party service providers?

We require third parties to respect the security of your data and to treat it in accordance with the law and to comply with our GDPR UK Policy.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security:

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention:

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes:

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information:

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you:

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent:

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice:

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Data Protection Officer:

We have an appointed data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice, how we handle your personal information or to make a complaint please contact the DPO by email hello@creasedpuddle.co.uk.

We are registered as required under GDPR UK (General Data Protection Regulation UK) with the Information Commissioner. Registration reference ZA781514.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO).